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Attorneys for Jeffrey I. Golden, Trustee

**UNITED STATES BANKRUPTCY COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**  
**SANTA ANA DIVISION**

In re

JAMIE LYNN GALLIAN,

Debtor.

Case No. 8:21-bk-11710-SC

Chapter 7

**TRUSTEE'S JOINDER IN OPPOSITION  
OF HOUSER BROS. CO. dba RANCHO  
DEL REY MOBILE HOME ESTATES TO  
DEBTOR'S MOTION TO CONVERT  
CASE TO CHAPTER 13**

[Hearing to be Set]

**TO THE HONORABLE SCOTT CLARKSON, UNITED STATES BANKRUPTCY JUDGE,  
AND INTERESTED PARTIES:**

Jeffrey I. Golden, the Chapter 7 trustee (the "Trustee") for the estate of Jamie Lynn Gallian (the "Debtor"), joins in the Opposition to Debtor's Motion to Convert Case to Chapter 13 Pursuant to 11 U.S.C. § 706(a) (*docket no. 449*) filed by Houser Bros. Co. dba Rancho Del Rey Mobile Home Estates (the "Houser Opposition") to the Debtor's Motion to Convert Case to Chapter 13 Pursuant to 11 U.S.C. § 706(a) (*docket no. 438*) (the "Conversion Motion").

As set forth in the Houser Opposition, the Debtor's Conversion Motion per Marrama v. Citizens Bank, 549 U.S. 365 (2007), should be denied based on the Debtor's repeated acts of bad faith, and no purpose would be served in converting the case to Chapter 13, only to re-convert it back to Chapter 7 based on inability to confirm a plan, after further delay. The Property is property of this estate, and filing a new Chapter 13 case does not mean that the Property becomes property

1 of the Chapter 13 estate. The Debtor's Conversion Motion is but another effort to interfere with the  
2 Trustee's administration of the Property – in violation of the Court's orally-announced OSC, and  
3 should be denied. The Trustee further prays for all other appropriate relief.

4  
5 DATED: September 24, 2024

DANNING, GILL, ISRAEL & KRASNOFF, LLP

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7 By: /s/ Eric P. Israel

8 ERIC P. ISRAEL

9 Attorneys for Jeffrey I. Golden, Trustee  
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## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 1901 Avenue of the Stars, Suite 450, Los Angeles, CA 90067-6006.

A true and correct copy of the foregoing document entitled (*specify*): **TRUSTEE'S JOINDER IN OPPOSITION OF HOUSER BROS. CO. dba RANCHO DEL REY MOBILE HOME ESTATES TO DEBTOR'S MOTION TO CONVERT CASE TO CHAPTER 13** will be served or was served (**a**) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (**b**) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) September 24, 2024 I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page.

**2. SERVED BY UNITED STATES MAIL:**

On (*date*) September 24, 2024, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page.

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on

(*date*) \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

September 24, 2024

*Date*

Patricia Morris

*Printed Name*

/s/ Patricia Morris

*Signature*

**ADDITIONAL SERVICE INFORMATION (if needed):**

**1. SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (“NEF”)**

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- **United States Trustee (SA)** ustpreion16.sa.ecf@usdoj.gov

**2. SERVED BY U.S. MAIL**

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Ronald Reagan Federal Building  
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